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OCT 28 2005

PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In the Application of)	
Applicants: James Benjamin Williams et al)	
Serial No. 10/797,889)	Examiner
Filed: March 10, 2004)	Thu Thao Haven
Title: Methods for issuing, distributing, managing and)	
redeeming investment instruments providing)	
securitized annuity options)	Art Unit 3624

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

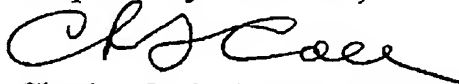
Dear Sir:

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The attached AMENDMENT (18 pages), Information Disclosure Statement (6 pages) and Credit Card Payment Form for the IDS submission fee (1 page) are being transmitted via facsimile to the central facsimile number of United States Patent and Trademark Office, (571) 273-8300, on October 28, 2005.

Dated: October 28, 2005

Respectfully submitted,



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Dear Sir:

AMENDMENT

In response to the outstanding Office Action mailed on August 25, 2005, please amend the above-identified application by making the changes set forth in the following "Amendments to the claims" section which begins on a separate page and is followed by a "Remarks" section.

11/02/2005 SSITHIB1 00000120 10797889

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